

# **EXHIBIT E**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOHN SHAFFER and  
JENNIFER SHAFFER, h/w  
110 Parkhurst Street  
Elkland, PA 16920

v.

FADI BADER SWEISS, MD  
740 High Street, Floor 3  
Williamsport, PA 17701

KELLY L. FARRELL, PA-C  
740 High Street, Floor 3  
Williamsport, PA 17701

SUSQUEHANNA PHYSICIAN  
SERVICES d/b/a The Neuroscience  
Center  
1201 Grampian Boulevard  
Williamsport, PA 17701

BRITTANY T. GRUBB, RN  
700 High Street  
Williamsport, PA 17701

UPMC WILLIAMSPORT  
700 High Street  
Williamsport, PA 17701

UNITED STATES OF AMERICA  
c/o United States Attorney for the  
Middle District of Pennsylvania  
240 W. 3<sup>rd</sup> Street  
Williamsport, PA 17701-6465

Civil Action

Case No. \_\_\_\_\_

Jury Trial Demanded

Electronically filed

**Certificate of Merit as to UPMC Williamsport**

I, Dennis M. Abrams, certify that:

- X an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this defendant in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND

- X the claim that this defendant deviated from an acceptable professional standard is based on allegations that other licensed professionals for whom this defendant is responsible deviated from an acceptable professional standard and an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

- expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this defendant.

LOWENTHAL & ABRAMS, PC

BY: /s/ Dennis M. Abrams  
DENNIS M. ABRAMS, ESQUIRE